



OFFICE OF RESEARCH-NSU

CONFLICT OF INTEREST POLICY FOR RESEARCH

(approved by NSU Board of Trustees on 19 November 2023)

1. Preamble

According to its Research Mission Statement, North South University aspires to an institutional research capacity that:

- Is diversified among basic and applied research;
- Supports and contributes to the National Research Strategy;
- Assures the public of its research integrity in the conduct of its scientists and scholars;
- Promotes inter-institutional and international cooperative and collaborative research opportunities;
- Advances local science and technology innovation through international research collaboration as well as collaboration with government, professions, and industry;
- Promotes and disseminates research outcomes having research impact;
- Is integrated with its teaching-learning mission.

Accordingly, it is incumbent on the University authority to assure the public at large that all research conducted by and through the engagement of the university's faculty is consistent with the highest standards of research integrity. A conflict of interest policy applicable to research is part and parcel of the university's commitment to objectivity and integrity in the research undertaken by the faculty of the university. Accordingly, with the approval of the Board of Trustees of the university, the Office of Research-NSU hereby issues this conflict of interest policy, effective from the date of approval by the NSU Board of Trustees (date as noted above below the title).

2. Definition of Conflict of Interest

- a. A conflict of interest can arise in any number of situations of faculty engagement in research, whether undertaken severally or jointly as part of a collaborative research project with other faculty, in the capacity of principal investigator or co-investigator, in relation to internal research institutes and/or centers of research, external funding agencies and organizations, institutions both governmental and non-governmental, including here research projects involving national and international collaborations with or without shared research funding, and in view of stated terms of research grant awards governing the dissemination of research outcomes, development and commercial deployment of technologies, and application and ownership of patents. Faculty are expected to be especially careful in situations where there may be impropriety involving personal financial gain, i.e., a financial conflict of interest.



- b. A conflict of interest may occur whenever a personal, professional, financial, or other private interest conflicts with, or is perceived to conflict with, the legitimate interests of North South University as manifest in its constituted authority under the Private University Act, as stated in its teaching and research vision and mission statements, in its administrative and regulatory authority as represented by university policies and regulatory/operating procedures, and in its compliance with governmental authorities.

3. Compliance Process

- a. It is the responsibility of each faculty member to be attentive (i) to situations of research engagement where a real or perceived conflict of interest may arise and (ii) his/her professional judgment or obligations under university policies may be compromised; (iii) formally to disclose in writing any conflict of interest whenever a real or perceived conflict of interest is identifiable; and (iv) to perform with the utmost integrity and objectivity in any research project in which s/he is involved while an employee of North South University.
- b. When accepting external research grant awards from agencies or organizations that require filing of a disclosure form for conflict of interest, the faculty member engaged in research as a principal investigator or co-investigator of a research project and having co-investigators and/or key personnel (including consultants, postdoctoral fellows, graduate students, etc.) involved in the project are required to assure that all personnel engaged in a given research project shall duly file with the Office of Research-NSU the appropriate disclosure certification form on conflict of interest.
- c. In the case of receipt of an external research grant, an NSU faculty member shall complete and submit the certification form within 15 days of receiving notice of approval of an external research grant award.
- d. A faculty researcher completing and submitting a disclosure certification form is expected to include therein acknowledgement that s/he has read this policy and is bound by the terms of this policy and other policies related to research integrity as approved by NSU authority.
- e. The Office of Research-NSU shall make available to faculty the requisite OR-NSU approved form for such declaration and disclosure. All completed and submitted forms are reviewed, ~~and~~ approved, and archived by the Director, Office of Research-NSU, and otherwise in exceptional cases referred to the Vice Chancellor as appropriate to such approval.

4. Key Terms

- a. *Significant Financial Interest*: A faculty member serving as Principal Investigator or Co-Investigator in a research project funded by an external agency, may be said to have a significant financial interest (i.e., having monetary value) related to his/her professional responsibilities undertaken on behalf of NSU.



- b. *Financial Conflict of Interest:* A faculty member as noted in (4a) above may be said to have a financial conflict of interest whenever a significant financial interest can affect the design (protocol) and performance of research activities or the dissemination of research results/outcomes (e.g., in conference proceedings, book or journal publication, etc.) in such a way that the objectivity of the design (protocol), performance of research activities, or dissemination of research outcomes may be compromised contrary to NSU's policies governing research, including (i) human subjects protections policy, (ii) animal care and use policy, (iii) biosafety policy, and (iv) research misconduct policy.

Exclusions: Faculty basic salary and standard benefits that are part of the employment contract do not count for purpose of financial disclosure under this policy. Honoraria received from NSU or external institutions for the delivery of an occasional lecture, participation in a seminar, or NSU-approved temporary teaching engagement also do not count for the purpose of financial disclosure under this policy.

- c. *Designated Official:* The Director, Office of Research-NSU, is responsible for receiving, reviewing, approving, and archiving all disclosure compliance forms/records involving disclosure and certification of a real or perceived conflict of interest and is the designated official for this purpose.

5. Investigation for Non-compliance with Conflict of Interest Policy

In the event it is alleged that a faculty member has failed to disclose a real or apparent conflict of interest consistent with the foregoing provisions, the Director, Office of Research-NSU, in consultation with the Vice Chancellor, shall constitute an Ad Hoc Committee for the purpose of investigating the allegation and submitting to the Director, Office of Research-NSU, a report that either affirms or disputes the allegation and otherwise recommends appropriate resolution of the matter at issue. After consultation with the Vice Chancellor, the Director, OR-NSU, shall have the authority to appoint the chairperson and members of this committee, the latter to include both senior faculty and diverse representation from several schools. The Director, OR-NSU shall stipulate the charge of the committee in writing when it is formally constituted and provide requisite guidance as to operating procedure. This committee shall be expected to complete its charge within 30 days of initiation of its investigation.

6. Administrative Action for Non-compliance

After review of the report from the Ad Hoc Committee, the Director, OR-NSU, shall consider appropriate administrative actions to be taken and submit a recommendation in writing to the Vice Chancellor. The Vice Chancellor shall issue a formal memorandum to the individual faculty researcher specifying the administrative action taken. The Vice Chancellor's decision is final and not subject to appeal.



7. Public Notice of Policy

Consistent with its stated research vision and mission, the Director, Office of Research-NSU, shall make this policy available for public viewing on the website of the Office of Research-NSU. Any amendment or revision to this policy must be reviewed and approved by the Academic Council, the Syndicate, and Board of Trustees. The revised version of the policy approved by the Board of Trustees is to be updated on the OR-NSU website within 15 days of formal approval of said amendment or revision, as represented by the approved minutes of the meeting of the Board of Trustees in which the approval occurred.